

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO ALL CASES	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**MOTION TO STRIKE PLAINTIFFS' NOTICE OF ADOPTION OF PRIOR
EXPERT REPORTS AND TESTIMONY OF DR. BRUCE ROSENZWEIG**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively "Ethicon") hereby move to strike Plaintiffs' Notice of Adoption of Prior Expert Reports and Testimony of Dr. Bruce Rosenzweig (Doc. 3947). As grounds for this motion, Ethicon submits that Plaintiffs' notice of adoption is improper to the extent that it runs afoul of the Court's expert disclosure requirements and restrictions. Ethicon requests that the Court strike Plaintiffs' Notice of Adoption and further direct the parties' experts, in the future, to avoid incorporating by reference other reports.

In support of this motion, Ethicon has filed a memorandum, as well as certain plaintiffs' expert designations (filed herewith as collective Exhibit A) and excerpts of Dr. Rosenzweig's Wave 5 reports (filed herewith as collective Exhibit B).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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